

EXHIBIT 3

Stefanie Taub

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3 KEVIN RISTO,)
4)
5 Plaintiff,)
6)
7 v.)
8) No.
9 SCREEN ACTORS) 2:18-cv-07241-
10 GUILD-AMERICAN) CAS-PLA
11 FEDERATION OF)
12 TELEVISION AND RADIO)
13 ARTISTS, et al.,)
14)
15 Defendants.)

16 TUESDAY, OCTOBER 20, 2020

17 - - -

18 Remote videotaped deposition of
19 Stefanie Taub, held at the location of the
20 witness in Los Angeles, California,
21 commencing at 9:05 a.m. Pacific Time, on the
22 above date, before Carrie A. Campbell,
23 Registered Diplomat Reporter, Certified
24 Realtime Reporter, Illinois, California &
25 Texas Certified Shorthand Reporter, Missouri
& Kansas Certified Court Reporter.

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- - -

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1 I mean, if -- if The Fund all
2 the sudden was distributing a billion
3 dollars a year, I don't know. But I
4 would have to know what circumstances
5 were involved and what -- what that
6 meant in the big picture to make an
7 evaluation of that. I really can't
8 answer without additional facts.

9 QUESTIONS BY MS. MCCONNELL:

10 Q. Would you need to know how much
11 work the unions were putting into responding
12 to Fund inquiries to make that evaluation?

13 MR. THOMAS: Objection. Vague.
14 Misstates her testimony.

15 THE WITNESS: I mean, not a
16 particular number. You know, part of
17 the evaluation comes into, you know,
18 how -- how valuable is that
19 information to The Fund being able to
20 do its work.

21 So, you know, it's not only a
22 factor of the work that the unions do
23 on a day-to-day basis to provide that.
24 There's a separate value that is, you
25 know, hugely valuable to The Fund

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1 because there's no other source that
2 has -- I mean, there's other sources
3 we use for research, but the --
4 getting a union session report and
5 getting access, direct access, to the
6 union database information is
7 something that is not available
8 anywhere else, and that's a really
9 large part of our work.

10 So, you know, it's not just the
11 number of hours that the union's staff
12 spends responding to inquiries.

13 QUESTIONS BY MS. MCCONNELL:

14 Q. If I understand you correctly,
15 you're saying that there is an incalculable
16 value in the membership database that you
17 think justifies the increase in service fee
18 amount?

19 MR. THOMAS: Object to the
20 form. Vague and misstates the
21 witness' testimony. Argumentative.

22 THE WITNESS: No, I didn't say
23 incalculable. I said it's a very
24 large value. And it's very valuable
25 to The Fund, to enable to fund -- The

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1 Fund to do its work that we're, you
2 know, entrusted to do by the
3 participants, to get that money out to
4 them.

5 So that -- you know, that's a
6 huge value. Again, I can't say
7 it's -- nothing's -- well,
8 incalculable is not the word.

9 QUESTIONS BY MS. MCCONNELL:

10 Q. Okay. As CEO of The Fund, have
11 you looked into how The Fund could replicate
12 the membership data at a lower cost?

13 A. As far as I know, there's not
14 another source that we could obtain that
15 from.

16 Q. At this point, haven't you
17 obtained all of the information -- strike
18 that.

19 You told us earlier that every
20 quarter the membership data is sent over from
21 SAG-AFTRA to The Fund, right?

22 A. Yes.

23 Q. And I think you told us earlier
24 that there's -- there's something that we
25 called The Fund's system where The Fund

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1 QUESTIONS BY MS. MCCONNELL:

2 Q. And so maybe I'm
3 misunderstanding, but isn't what you're
4 describing that The Fund actually has better
5 information than what you're receiving from
6 the unions?

7 MR. THOMAS: Objection.

8 Misstates her testimony.

9 THE WITNESS: I wouldn't say
10 better. It may be different depending
11 on that snapshot in time. You know,
12 we -- again, that's -- it's
13 information we use in conjunction with
14 a lot of other information. We do --
15 we do other types of searches, and we
16 talked about some of the other sources
17 that we use.

18 So, you know, our goal is to
19 have it be as correct and possible and
20 uses as many reliable sources as we
21 can.

22 But the union membership
23 information, as far as I know, is --
24 would not be available to us
25 anywhere -- from another source.

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CERTIFICATE

I, CARRIE A. CAMPBELL, Registered
Diplomate Reporter, Certified Realtime
Reporter and Certified Shorthand Reporter, do
hereby certify that prior to the commencement
of the examination, Stefanie Taub, was duly
sworn by me to testify to the truth, the
whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the
foregoing is a verbatim transcript of the
testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor attorney
nor counsel of any of the parties to this
action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.



CARRIE A. CAMPBELL,
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Missouri Certified Court Reporter #859
Illinois Certified Shorthand Reporter
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Texas Certified Shorthand Reporter #9328
Kansas Certified Court Reporter #1715
Notary Public
Dated: November 2, 2020

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ACKNOWLEDGMENT OF DEPONENT

I, Stefanie Taub, do
hereby certify that I have read the foregoing
pages and that the same is a correct
transcription of the answers given by me to
the questions therein propounded, except for
the corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.


Stefanie Taub

11/30/2020
DATE

Subscribed and sworn to before me this
_____ day of _____, 20 ____.

My commission expires: _____

Notary Public